

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CASE
ON THE EXHIBIT ATTACHED HERETO

JOINT MOTION TO DISMISS DEFENDANT COLOPLAST CORP. WITH PREJUDICE

Plaintiffs whose case is listed on the attached Exhibit A and defendant Coloplast Corp.¹ (“Coloplast”) advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims, and third-party claims. Accordingly, they jointly move the court to dismiss Coloplast as a defendant in this action with prejudice, and terminate Coloplast from the docket in this action, parties to bear their own costs. Other defendants remain in this action, and Plaintiffs will continue to prosecute this action against them.

¹ Coloplast Corp. includes any incorrect or incomplete spellings of this Defendant, including Coloplast, Coloplast A/S, Coloplast Corporation, Coloplast Group, Coloplast Incorporated, Coloplast Manufacturing U.S., L.L.C., Coloplast Manufacturing U.S., LLC, Coloplast Manufacturing US, LLC, Coloplast Manufacturing, LLC, Coloplast Manufacturing, US LLC, Coloplast Manufacturing, US, L.L.C., Coloplast Manufacturing, US, LLC, and Coloplast, Inc.

Respectfully:

/s/ Lana K. Varney

Lana K. Varney
KING & SPALDING LLP
500 W. 2nd Street, Suite 1800
Austin, TX 78701
512.457.2060 (phone)
512.457.2100 (fax)
lvarney@kslaw.com
Attorney for Defendant Coloplast Corp.

/s/ Christopher W. Cantrell

Christopher W. Cantrell
William J. Doyle, II
DOYLE LOWTHER
Suite 275
4400 NE 77th Avenue
Vancouver, WA 98662
360.818.9320 (phone)
360.450.3116 (fax)
ccantrell@doylelowther.com
bill@doylelowther.com

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV
BRANSTETTER STRANCH & JENNINGS
Suite 200
223 Rosa L. Parks Avenue
Nashville, TN 37203
615.254.8801 (phone)
615.255.5419 (fax)
gerards@bsjfirm.com

Attorney for Plaintiffs on Exhibit A

Dated: January 24, 2019

EXHIBIT A – DOYLE LOWTHER; BRANSTETTER STRANCH & JENNINGS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-06252	Diana Gabriel, et al. v. Ethicon, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/ Lana K. Varney

Lana K. Varney